

EXHIBIT 2 –
Leo v. Lowe, Defendant's
Amended Response and
Counter Petitioner

**IN THE DISTRICT COURT OF GARVIN COUNTY
STATE OF OKLAHOMA**

STATE OF OKLAHOMA
GARVIN COUNTY

SS.

FILED

JAN 15 2021

AT 2:24 P'CLOCK M.
LAURA LEE, Court Clerk
BY: [Signature] DEPUTY

CARRIE M. LEO,

Plaintiff,

vs.

**JEFFREY L. LOWE and
LAUREN F. LOWE,**

Defendants.

Case No.: CJ-2019-89


DEFENDANT'S AMENDED RESPONSE AND COUNTER PETITIONER

Come now, Jeffrey L. Lowe and Lauren F. Lowe, by and through their attorney of record, Robert T. Rennie, Jr., and submit the following as their Response to the Petition on file herein.

1. The Defendants admit the allegations contained in paragraphs numbered 1, 6, 7, 15, 21 and 22 of the Petition on file herein.
2. The Defendants are without sufficient knowledge to admit or deny and allegations contained in paragraphs numbered 4, all paragraphs number the Background portion of the Plaintiff's Petitioner, paragraphs numbered 10, 11, 12, 14, 16, 18, 19, 23, 33, 34 and 38, of the Petition on file herein.
3. The Defendants deny the allegations contained in paragraphs numbered 2, 3, 4, 5, 8, 9, 13, 17, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35, 36, 37, 39, 40, 41, 42, 43, 44, 45, 46, and 47 of the Petition on file herein and demands strict proof of the same.
4. Upon further review of the Plaintiff's list of animals which are the subject to this action, the Defendant does not have possession of those animals.
5. The Defendants have been forced to retain counsel to represent them in this action and request this Court to award them attorney fees and costs of this action.

6. The Defendants deny that they have any personal liability to the Plaintiff and that Joe Maldonado-Passage had the authority to act on their behalf.

Wherefore, premises considered, the Defendants pray the Plaintiff take nothing by way of her Petition on file herein, enter and order requiring the Plaintiff to pay Plaintiffs' attorney fees and costs of this action and for such other and further relief as the Court deems equitable and proper.

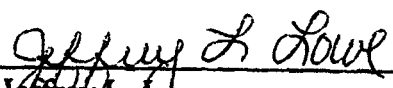

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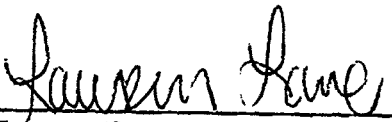
VERIFICATION

STATE OF OKLAHOMA)
COUNTY OF GARVIN) ss.

Jeffrey L. Lowe and Lauren F. Lowe, of lawful age, being first duly sworn, state:

That they are the Defendants above named; that we have read the above and foregoing Respondent and Counter Claim and know the contents thereof, and that the statements, allegations and facts therein set forth are true and correct to the best of our information, knowledge and belief.


Jeffrey L. Lowe


Lauren F. Lowe

Subscribed and sworn to before me this 15th day of January, 2021.

My Commission Expires:

9/29/2020



Vicki Rennie
Notary Public

CERTIFICATE OF MAILING

This is to certify that on the date of filing, I mailed a true and correct copy of the above foregoing document to Carrie M. Leo, Plaintiff, at 3199 Walworth Road, Walworth, New York, 14568, with proper postage fully prepaid thereon.

Robert T. Rennie, Jr.
Robert T. Rennie, Jr.